

**Schedule (2)(c)(1)
Defendants' Exhibits¹**

Defendants' Exhibit No.	Description	Plaintiff's Basis for Objection	Defendants' Response to Objection
D1	2004 Sergeant Posting, Bates No. D1023-D1024		
D2	New Castle County Merit System Manual, Bates Nos. D0097-D0189		
D3	New Castle County Police Directive 32, Bates Nos. D0006 - D0010		
D4	New Castle County Police Directive 34, Bates Nos. D0011 - D0014		
D5	New Castle County Police Directive 54, Bates Nos. D0381 -D0383		
D6	New Castle County Operating Budget 2006 Bates Nos. D0190-D0380		
D7	Substitute No. 1 to New Castle County Budget Ordinance 05-038, Bates Nos. D1397-D1409		
D8	Dec. 1, 2004 Eligible List, Bates No. D2045-D2048		
D9	Memo from Marge Ellwein dated May 20, 2005, Bates No. D1011-D1012		

¹ BY DEFENDANTS: In addition, Defendants reserve the right to use documents previously identified by Plaintiff as Exhibits.

D10	2003 Results Letter, Bates No. D0438	Plaintiff objects - F.R.E., 402	Personnel records documenting the NCCPD career of plaintiff and the comparators are the most relevant and probative evidence available in a promotion case.
D11	December 5, 2005 Memo from McLaren to Crowell, Bates Nos. D1061-D1069		
D12	2006 Promotional Posting, Bates No. D1021-D1022		
D13	Memo from McAllister dated May 10, 2005, Navarro Deposition Exhibit 1		
D14	2004 Sergeant Class Spec., Bates No. D1025-D1026		
D15	Memo to Guy H. Sapp from David McAllister dated 6/27/05, Bates No. D1013		
D16	Plaintiff's test results - Sergeant Exam 1996 - Bates Nos. 0531-0532.		
D17	Plaintiff's test results - Sergeant Exam 1998 - Bates Nos. D0490-D0491	Plaintiff objects - F.R.E., 402	Personnel records documenting the NCCPD career of plaintiff and the comparators are the most relevant and probative evidence available in a promotion case.
	Plaintiff's test results - Sergeant	Plaintiff objects - F.R.E., 402	Personnel records

D18	Exam 1999 - Bates Nos. D0466-D0467	documenting the NCCPD career of plaintiff and the comparators are the most relevant and probative evidence available in a promotion case.
D19	Plaintiff's test results - Sergeant Exam 2000 - Bates Nos. D0479-D0480	Plaintiff objects – F.R.E., 402 Personnel records documenting the NCCPD career of plaintiff and the comparators are the most relevant and probative evidence available in a promotion case.
D20	Plaintiff's test results - Sergeant Exam 2001 - Bates Nos. D0459-D0460	Plaintiff objects – F.R.E., 402 Personnel records documenting the NCCPD career of plaintiff and the comparators are the most relevant and probative evidence available in a promotion case.
D21	Plaintiff's test results - Sergeant Exam 2003 - Bates Nos. D0435-D0436	Plaintiff objects – F.R.E., 402 Personnel records documenting the NCCPD career of plaintiff and the comparators are the most relevant and probative evidence available in a promotion case.
D22	Plaintiff's test results - Sergeant Exam 2004 - Bates Nos. D0400-D0401	Plaintiff objects – F.R.E., 402 Personnel records documenting the NCCPD career of plaintiff and the comparators are the most relevant and probative evidence available in a promotion case.

			promotion case.
D23	Police Requisition, Bates No. D1028		
D24	Police Requisition, Bates No. D1032		
D25	Police Requisition, Bates No. D1033		
D26	Police Requisition, Bates No. D1034		
D27	Police Requisition, Bates No. D1035		
D28	Police Requisition, Bates No. D1036		
D29	Police Requisition, Bates No. D1037		
D30	Police Requisition, Bates No. D1040-D1041 NOTE: PENDING MOTION IN LIMINE		
D31	Police Requisition, Bates No. D1029-D1030 NOTE: PENDING MOTION IN LIMINE		
D32			
D33			
D34			
D35			
D36			
D37			

D38					
D39					
D40					
D41					
D42					
D43					